

1 David Mincin, Esq.
2 Nevada Bar No. 5427
3 MINCIN LAW, PLLC
4 7465 W. Lake Mead Boulevard, #100
Las Vegas, Nevada 89128
dmincin@mincinlaw.com
Phone: 702-852-1957
Fax: N/A
Attorney for Plaintiff

5
6 **UNITED STATES DISTRICT COURT**
7
8 **DISTRICT OF NEVADA**

9 CHINA AUTO LOGISTICS, INC., a Nevada
Corporation,

Case No.: 20-CV-00646-GMN-EJY

10 Plaintiff,
11 vs.
12 DLA PIPER, LLP, a Maryland Limited
13 Liability Partnership,
14 Defendant.

15 **STIPULATION AND ORDER TO EXTEND TIME FOR RULE 26 (4th REQUEST)**

16 **Whereas** this action was filed by Plaintiff China Auto Logistics against Defendant
17 DLA Piper LLP (US) in Clark County District Court, State of Nevada, on March 13, 2020.

18 **Whereas** Defendant DLA Piper LLP (US) filed a notice of removal removing this
19 action to this court on April 6, 2020.

20 **Whereas** Defendant DLA Piper LLP (US) filed a motion to dismiss on April 13, 2020
21 in which it challenges personal jurisdiction over it Nevada courts.

22 **Whereas** the parties believe cause exists to extend the time for holding a Rule 26(f)
23 conference for the following reasons. 1) judicial economy favors forbearing on opening
24 discovery until the court resolves Defendant DLA Piper LLP (US)'s objection to personal
25 jurisdiction in this court. 2) numerous eye-witnesses, shareholders, officers and members of
26 Plaintiff China Auto Logistics's board reside in China. A general ban currently exists that

1 would prohibit travel from China to the United States. Plaintiff believes it will be extremely
2 challenging to coordinate witness depositions until the travel ban is resolved. 3) Numerous
3 other witnesses reside outside of Nevada and the United States. The parties believe it will be
4 challenging to coordinate these depositions and other discovery until travel and other business
5 restrictions that exist due to the coronavirus pandemic are lifted.

6 **It Is Therefore Stipulated And Agreed** that the time to hold the Fed. R. Civ. P. 26(f)
7 conference is extended to January 15, 2021 and the time to submit a proposed scheduling
8 order required by LR 26-1 be extended to February 2, 2021.

9 || SO STIPULATED

SO STIPULATED

10 | DATED this 27th day of October, 2020.

DATED this 27th day of October, 2020.

11 | MINCIN LAW, PLLC

LIPSON NEILSON PC

13 By: /s/ David Mincin
14 David Mincin, Esq.
State Bar No.5427
15 7465 W. Lake Mead Boulevard, #100
Las Vegas, Nevada 89128
Attorney for Plaintiff

By: /s/ Lisa J. Zastrow
Joseph P. Garin, Esq.
State Bar No. 6653
Lisa J. Zastrow, Esq.
State Bar No. 9727
9900 Covington Cross Dr., #120
Las Vegas, Nevada 89144
Attorney for Defendant

ORDER

Based on the foregoing Stipulation between the parties:

IT IS HEREBY ORDERED that the time to hold the Fed. R. Civ. P. 26(f) conference is extended to January 15, 2021 and the time to submit a proposed scheduling order required by LR 26-1 be extended to February 2, 2021.

DATED this 28th day of October, 2020.

Eayna J. Zouchah
UNITED STATES MAGISTRATE JUDGE

111